Prepared for:

TRANSCO INC.
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Skokie, IL 60077

SOIL MANAGEMENT PLAN
Former Transco Railcar Facility
Macon, Georgia

Prepared by:

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August 2021

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1 INTRODUCTION

This Soil Management Plan ("SMP") has been prepared for the management of soil at the Former Transco Railcar Repair Facility located at 989 Seventh Street, Macon, Georgia, which is identified as Tax Parcel ID R0810091OC 79 (the "site"). The site soil complies with site-specific non-residential (Type 4) soil Risk Reduction Standards ("RRS") based on the requirements of the Voluntary Remediation Program. However, this SMP is to be followed during all soil disturbance activities in the event that contamination above applicable RRS is identified at the site. Land disturbing activity shall be conducted under the direction of a Georgia registered professional engineer or a Georgia registered professional geologist who has experience in the responsible charge of the investigation of releases of regulated substances.

This SMP provides information and general procedures for the following topics:

- Site Background (Section 2)
- Personal Protective Equipment (Section 3)
- Field Methods and Procedures (Section 4)
- Soil Disturbance Worker Requirements (Section 5)
- Documentation and Reporting (Section 6)
- References (Section 7)

All project engineers, scientists, site personnel, contractors, and others involved in defining, overseeing, or conducting any soil disturbance activity are required to review and perform work in accordance with this SMP.

2 SITE BACKGROUND

2.1 Site Overview

The site is located in an industrial area (zoned industrial) southeast of downtown Macon, Georgia (Figure 1). Land use immediately adjacent to the site is industrial and is primarily railroad related, with several surrounding land parcels designated a public utility due to their use to support public works or railway infrastructure. The site is bound by railroad tracks on the western, southern, and northeastern property boundaries, and by 7th Street to the east.

Since at least 1889, the site was developed to support the railroad industry and was occupied until 1991 when operations ceased. The site is currently vacant, and the only remaining structure is a former multi-story coal chute near the site's south entrance. Concrete and brick foundations of several of the former buildings remain on the site but are leveled to grade. The remainder of the site has undergone natural succession to scrub grass, shrubs, and small to medium-sized trees. Figure 2 depicts the location of former and existing site infrastructure.

2.2 Regulatory Summary

Environmental assessment activities for the site began on or around 1995 following the closure of the facility in 1991. The site was listed by the Georgia Environmental Protection Division ("EPD") under the Hazardous Site Response Act ("HSRA") Hazardous Site Inventory (HSI) in 1998. Regulated substances released at the site include the following: lead and PCBs in soil; and chlorobenzene, cumene, naphthalene, tetrachloroethene ("PCE"), vinyl chloride, cis-1,2-dichloroethene ("cis-DCE") and trichloroethene ("TCE") in groundwater. Several constituents were present above HSRA RRS. Consequently, a Corrective Action Plan ("CAP") was prepared under the Georgia Hazardous Site Response Act to address identified environmental conditions in 2001, which was finally approved in 2008. Corrective action was performed for soil and groundwater at the site. In 2017, the site applied and was accepted into the Georgia Voluntary Remediation Program ("VRP") to manage the site's environmental matters. Additional data assessment and verification activities were performed to demonstrate compliance with the CAP objectives following corrective action. In 2020, a Compliance Status Report ("CSR") requesting closure of environmental matters was submitted to EPD. The CSR concluded that soil was in compliance with the site-specific nonresidential RRS under the VRP based on the analysis of future exposure unit or land parcel options. Although a compliance certification for groundwater is not required, the CSR further concluded that remedial objectives for groundwater had been achieved with certain institutional controls being implemented. Further information on each environmental matter is available in the *Voluntary Remediation Program Compliance Status*

Report, Revision 1 and Second High-Vacuum Extraction Event (EPS, 2020), which was conditionally approved by EPD letter dated January 29, 2021.

2.3 Site Geology

Site geology consists largely of fill, Quaternary alluvium, undifferentiated Cretaceous sediments (Blufftown/Eutaw formation overlying the Tuscaloosa formation) and crystalline bedrock. Fill is unconsolidated and consists of lumber debris, metal debris, sands, coal fragments and minor gravel. These manmade materials are mixed with alluvial sand, silty sand, sandy silt and sandy to silty clay.

Borehole logging from soil cores and monitoring well installation indicates three hydrogeologic zones exist at the site (Arcadis, 2000). The upper zone includes the fill, alluvium, and sand in the shallow portions of the upper Cretaceous zone. These materials consist of loose clayey sand, fine to medium to subangular sand, and fine gravel with minor clay, sandy clay, clayey sand and sandy silt. Lumber debris and coal fragments and fines are observed in the upper zone as well. The upper zone has a Unified Soils Classification System (USCS) classification that is predominantly SP and SM. This zone averages 18 ft thick with a range of thickness from zero to 28 ft. The middle zone is undifferentiated Cretaceous and is comprised of mottled silty clay, sandy clay, and clay with minor wood debris (natural), clay and gravel. The middle zone has a USCS classification of SC, CL, and minor SM. This zone averages 44 ft thick with a range of thickness from 34 to 58 ft-bgs. The average depth to the top of this zone is 18 ft-bgs ranging from zero to 28 ft-bgs. The lower zone consists of sand and gravel in the lower portion of the undifferentiated Cretaceous, saprolitic bedrock and jointed/fractured partially weathered bedrock. The basal upper Cretaceous is represented by sand and gravelly sand with minor clay. Saprolitic bedrock is characterized as consolidated to semi-consolidated sandy silt, clayey sand and sandy clay. More competent and partially weathered bedrock samples revealed fine-grain gneiss and foliated fine-grained diabase. The average depth to the top of this zone is 62 ft-bgs with a range from 58 to 66 ft-bgs.

Groundwater flow direction mimics the ground surface topography, moving east across the site, then turning southeast near 7th Street. The hydraulic gradient is approximately 0.017 ft/ft on-site and 0.024 ft/ft east of the site. The hydraulic properties of the near-surface aquifers were evaluated with slug testing by Arcadis for the CSR (Arcadis, 2000). The upper hydrogeologic zone has a horizontal hydraulic conductivity range of 0.7 ft per day (ft/day) to 6 ft/day with an average of 3 ft/day. The lower hydrogeologic zone has a horizontal hydraulic conductivity range of 6 to 110 ft/day with an average of 75 ft/day.

3 PERSONAL PROTECTIVE EQUIPMENT

3.1 Project-Specific Health and Safety Plans

The available data indicates that soil and groundwater at the site are known to be impacted with volatile organic compounds ("VOCs"), semi-volatile organic compounds ("SVOCs"), and metals. Therefore, prior to conducting any activities that will disturb the soil at the site a project-specific Health & Safety Plan ("HASP") will be written. The HASP will present the site- and project-specific procedures that must be followed by all employees and any other personnel (i.e., contractors) during soil disturbance activities. The HASP will also describe the personal protective equipment ("PPE") that will need to be used during soil disturbance work.

3.2 Chemical Hazards

Historically, chemicals have been detected in the soil and groundwater at the site. The potential for the ingestion of chemicals (or media that contain chemicals) during soil disturbance activities will be controlled by prohibiting any eating, smoking, or drinking in the work zone, and by requiring all field personnel to remove soil particles adhered to their clothing and boots prior to leaving the work zone (or site if a designated work zone is not established for a particular activity). In addition, potential hazards associated with dermal contact will be minimized by using appropriate PPE; specifically, Level D PPE and/or Modified Level D PPE (defined below) will be used by the personnel involved in conducting soil disturbance activities. Further, if unexpected vapors are identified during the excavation activities, the activities will be suspended, workers will leave the impacted work area, and will contact the Environmental Health & Safety ("EH&S") Manager or owner designated representative for further instructions. Activities may resume once the concerns have been addressed. A comprehensive list of potential chemical hazards will be included in a project-specific HASP.

3.3 Safety Equipment Requirements

It is anticipated that Level D will be the highest personal protective level required to complete soil disturbance activities. However, if site conditions make it necessary to upgrade the level of protection, work shall be suspended and the EH&S Manager or designated representative will be contacted for guidance. Site workers shall be provided with all necessary safety equipment. Listed below is an itemized list of safety equipment required for Level D and Modified Level D PPE.

3.3.1 Level D PPE

General soil disturbance work:

- boots/shoes with steel-toes, and a shank;
- safety glasses with side shields, chemical splash goggles, or face shield;
- hard hat; and
- gloves (standard work gloves when working with tools or heavy equipment and/or latex/nitrile gloves when handling soil).

3.3.2 Modified Level D PPE

For soil disturbance activity that generates fugitive dust or splash hazard work areas (i.e., working in dry excavations or excavations containing standing water and any other conditions for which the EH&S Manager or designated representative considers such protection is needed), the following shall also be worn in addition to the Level D PPE listed above:

- particulate dust mask;
- Tyvek coveralls; and
- waterproof boots.

4 FIELD METHODS AND PROCEDURES

4.1 Procedures Statement

The general procedures that will be followed during soil disturbance activities at the site are presented in the following subsections.

4.2 Pre-Soil Disturbance Activities

Prior to soil disturbance activities, project personnel and the appropriate personnel, including all personnel involved in conducting soil disturbance activities, will meet to ensure that everyone understands the planned activities and the procedures described in this SMP. A project-specific HASP will be prepared that, at a minimum, presents the chemicals that may be encountered, potential exposure routes and toxicological effects, and methods to avoid and/or minimize exposure. The HASP will be available on-site at all times when soil disturbing activities are occurring.

4.3 Soil Disturbance Activities

Once the disturbance activities begin, the soil will be monitored for odors and discoloration. Dust will be controlled, if necessary, by wetting the soil in the area of disturbance.

4.3.1 Handling and Management of Excavated Soil

Soil that is excavated for purposes of disposal during these activities will be segregated and staged at a secure location on the site in a manner that prevents liquid infiltration, runoff, and generation of fugitive dust (e.g., covered drums, covered roll-off containers, or enclosed on all side by plastic sheeting). Samples of such excavated soil will be collected and characterized for disposal based on the written requirements of the receiving facility; the analyses will be conducted by a State of Georgia approved laboratory. These samples will be collected at a rate of one composite sample (obtained from four locations equally spaced across the area of the pile) for every 30 cubic yards of excavated material. The samples will be collected in accordance with EPA Region 4 Science and Ecosystem Support Division Operating Procedure: Soil Sampling, Number LSASDPROC-300-R4, dated 6-11-20 (SESD, 2020a).

Once the soil has been characterized, the site owner or its contractor will arrange for proper reuse/disposal. On-site reuse/disposal of soil may be allowed if the soil does not exceed the applicable non-residential RRS. Soil that exceeds applicable non-residential RRS will be transported from the site no more than 30 days from the completion of the activities associated

with the soil disturbance. Soil identified to exhibit contamination above site certification levels must be delineation to determine the nature and extent of contamination and managed in accordance with applicable regulations. Depending upon the waste determination of the displaced soil, the Operator may become a generator of Hazardous Waste and be subject to The Rules and Regulations of the State of Georgia 391-3-11-.08 Standards Applicable to Generators of Hazardous Waste, which incorporates 40 CFR Part 262 by reference.

4.3.2 Equipment Decontamination

All reusable equipment that will contact potentially contaminated soil or water will be decontaminated at the start of the project and prior to each reuse. The decontamination will be performed in accordance with EPA Region 4 Science and Ecosystem Support Division Operating Procedure: Field Equipment Cleaning and Decontamination, Number LSASDPROC-205-R4, dated June 22, 2020 (2020b, SESD).

In general, the decontamination procedures will consist of:

- non-phosphate detergent (i.e., Luminox) and tap water wash, using a brush if necessary;
- tap-water rinse; and
- deionized/distilled water rinse.

4.4 Post-Soil Disturbance Activities

After the soil excavation and related activities are complete, the documentation of the activities will be finalized in the logbook, with the original kept by the site-owner, and a copy maintained on-site. Information regarding the work conducted, including the location of the activity, the volume of material removed, the volume of backfill material placed on site, number of samples collected, analytical parameters, health and safety protocols, and monitoring activities will be maintained in the logbook.

The final laboratory analytical reports will be placed in the project files, along with the waste manifests, weight tickets, and final disposal reports.

5 SOIL DISTURBANCE WORKER REQUIREMENTS

All site workers and contractors performing work at the site that involves disturbing the soil must comply with the following procedures:

- The site owner and/or contractors are responsible for ensuring the safety of their workers during activities at the site. Workers must comply with all appropriate regulations, orders, permits, guidance and procedures while on-site including the following:
    - Occupational Safety and Health Administration (OSHA) Standards and Regulations, 29 CFR 1910 and 1926, including Hazardous Waste Operations and Emergency Response (HAZWOPER) Standard (29 CFR Section 1910.120); and
    - Resource Conservation and Recovery Act (RCRA) 40 CFR 261 and 264.
- Site workers and/or contractors must review this SMP before initiating work. Any questions involving the SMP should be directed to the site's EH&S Manager or designated representative.
- Site workers and/or contractors involved in soil disturbance activity must have received OSHA training and hazard communication training appropriate for the types of chemicals that could be encountered in the soil.
- Site workers and/or contractors that disturb soil must be properly trained to conduct field screening (e.g., use of a photoionization detector [PID] and other equipment described in the project-specific HASP). Any field observations must be maintained in a log that also describes the activity underway.
- Site workers and/or contractors must prepare and follow a site- and project-specific HASP that, at a minimum, presents the chemicals that may be present, potential exposure routes, and methods to avoid and/or minimize exposure. A copy of the HASP must be forwarded to the EH&S Manager or designated representative for review. The HASP must be available on-site at all times during the soil disturbance activities.
- Site workers and/or contractors must ensure that site workers use appropriate methods to handle and manage excavated soil. Soil suspected to be contaminated must be staged as discussed above for proper characterization.

6 DOCUMENTATION AND REPORTING

Documentation of soil disturbance activities at the site shall be recorded in a bound field logbook with consecutively numbered pages. All entries will use factual objective language, be legible, written in permanent ink, and signed by the individual making the entries. At a minimum, the following information will be recorded in the field logbook:

- general narrative recording daily activities;
- soil sample descriptions;
- site or sampling area sketch showing sample location, sample depths, and measured distances. The sampling area sketch will be scaled and the location of the sampling area will be depicted relative to a fixed structure;
- field instrument readings (including the location that the reading was obtained) and calibration;
- field observations and details related to analysis or integrity of samples (e.g., weather conditions, noticeable odors, soil staining, soil descriptions, soil colorations, etc.);
- lot numbers of the sample containers, sample identification numbers and any explanatory codes, and chain-of-custody form numbers;
- shipping arrangements;
- work start and stop times;
- summary of any meetings or discussions with contractors, regulatory agency representatives, or interested third parties; and
- levels of PPE used.

If soil disturbance activities involve any deviation from the approved SMP, a summary report will be submitted to EPD within thirty (30) days following completion of the soil disturbance activity, and will include the following as may be applicable:

- a written summary of the work performed, documenting the performance of all procedures specified in Section 4.0 (Field Methods and Procedures), as well as documentation recorded in the logbook as described above;
- a description of each deviation from the approved SMP, and the reason for each occurrence;
- tabulated laboratory analytical data for all post-excavation samples, with a comparison of the data to the appropriate screening values;
- a discussion of findings and/or resolution of each deviation;
- complete laboratory analytical data and reports for all samples collected, including chain of custody forms;
- waste manifests; and
- photographic documentation, if available.

7 REFERENCES

Arcadis Geraghty and Miller. (2000). *Compliance Status Report, Former Transco Railcar Facility*, HSI Site Number 10502.

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EPD. (2004). *Conditional Approval of the Revised Corrective Action Plan. Transco Railcar Facility (Former)*, 989 Seventh Street, Macon Georgia, HIS Site No. 10502.

EPD. (2008). Approval of the Response to NOF (Leaching Model Comments) and Groundwater Corrective Action Update, Transco Railcar Facility (Former), 989 Seventh Street, Macon Georgia, HSI Site No. 10502.

EPS. (2020). *Compliance Status Report, Revision 1, Former Transco Railcar Facility, Macon, Georgia*. HSI Site Number 10502.

SESD. (2020a). EPA Region 4 Science and Ecosystem Support Division Operating Procedure: Soil Sampling, Number LSASDPROC-300-R4, dated June 11, 2020.

SESD. (2020b). EPA Region 4 Science and Ecosystem Support Division Operating Procedure: Field Equipment Cleaning and Decontamination, Number LSASDPROC-205-R4, dated June 22, 2020 .

FIGURES

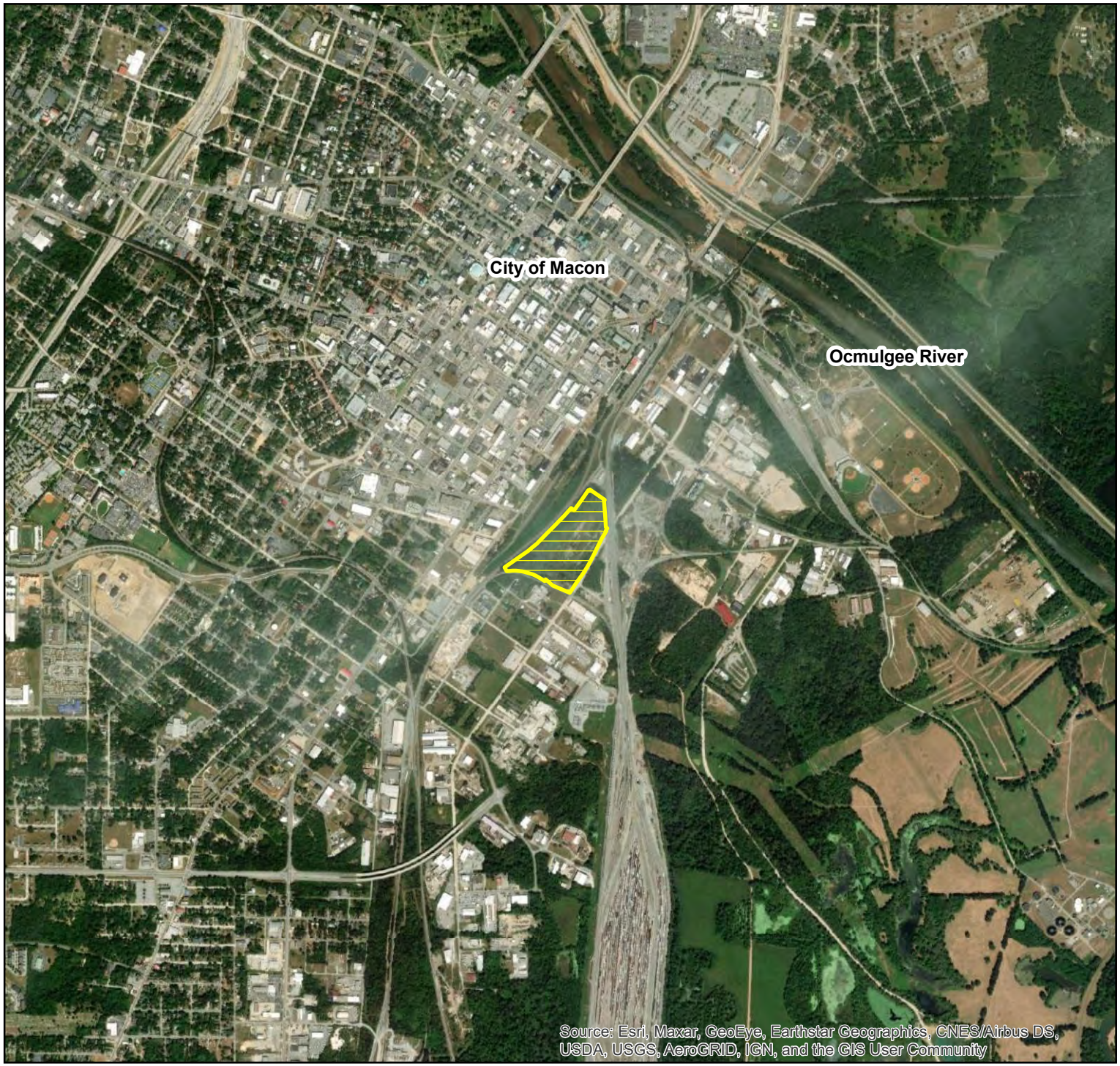

Figure 1
Site Location

Former Transco Railcar Facility
Macon, Georgia

Figure Narrative

Figure depicts the location of the Site in Macon, GA. The Ocmulgee River is located approximately 4000 ft to the north and east of the Site.

Notes

Physical Address:
861 7th Street
Macon, Georgia

Legend

Site

N
W E
S

0 1,000 2,000
Feet

Environmental Planning Specialists, Inc.

Figure 2
Site Features
(Former and Current)

Former Transco Railcar Facility
Macon, Georgia

Figure Narrative
Figure depicts the current and former Site features.

Notes
Physical Address:
861 7th Street
Macon, Georgia

Legend
Site
Site Fence

N
W E
S

0 125 250
Feet

Environmental Planning Specialists, Inc.